

August 9, 2021

BY ECF

The Honorable Lorna G. Schofield
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *Tyler Erdman v. Adam Victor, et al.*
No. 20 Civ. 4162 (LGS)

Dear Judge Schofield:

Plaintiff seeks leave to amend his complaint, in accordance with your Honor's June 16, 2021 order. To that end Plaintiff's proposed Amended Complaint removed Manhattan Place Condominium as a defendant, claims relating to Connecticut law, as well as his request for special damages.

Plaintiff has added the allegations required to sustain the complaint consistent with the order. This includes more sufficiently pleading facts relating to his claim of defamation, explaining the context of his allegations, as well as pleading Defendant's constitutional and common law malice with specificity.

In addition, Plaintiff has ensured there are no allegations relating to documents under seal in any action. He has also made sure that any similar information referenced is freely available.

Plaintiff has made substantial revisions to the structure of the complaint, as a result the red line copy is 30 pages longer than the proposed Amended Complaint. Since the red line might not be helpful for the Court, Plaintiff has also filled a regular copy of the proposed Amended Complaint.

Plaintiff believes that his changes are sufficient for the Complaint to be sustained and as such should be permitted to file his proposed Amended Complaint.

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Tyler Erdman

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